



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

May 12, 2008

Edgard Bertaut
TDY Industries, Inc.
c/o Allegheny Technologies
1000 Six PPG Place
Pittsburgh, PA 15222-5479

Re: Form U Submission WASTE MGMT OF PA TULLYTOWN FAC, LI TUNGSTEN
COOP GROUP, EC# 68096

Dear Mr. Bertaut:

As part of your company's attempts to secure approval for disposal of wastes from the Li Tungsten Superfund site in Glen Cove, NY, in the GROWS/Tullytown Pennsylvania landfill, you've recently made me aware of a requirement of the Pennsylvania DEP; namely, letters from both the US EPA and the State of NY regarding the involvement of radiation regulatory authorities at the Site while it was an operating facility. Therefore, I am providing the following information which is to the best of my knowledge and primarily from EPA's in-house information regarding the Li Tungsten Superfund site.

The generation of technically enhanced naturally occurring radioactive material, or TENORM, wastes through the processing of ores at the former Li Tungsten facility while it was operational prior to 1985 was not an activity regulated by any Federal radiation regulatory authority. During the EPA's remediation of this site (from 1992-present), any TENORM wastes that have shown elevated levels of radiation have been routinely disposed of at US Ecology, an Idaho facility that is permitted to accept low-level radioactive wastes for disposal.

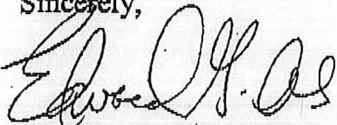
The 1,500 cy of stabilized D008 wastes that is the subject of the current request showed elevated levels of lead but radiation levels around the range of normal background. Based on this characterization, these wastes were deemed suitable for Subtitle D disposal after being chemically stabilized for lead.

Based on documents in EPA's possession, the Li Tungsten facility apparently did have a radioactive materials license from the NYS Department of Labor to work with thorium for the production of thoriated tungsten welding rods, wires and filaments. Apparently, this license was terminated in the early 1970's when operations involving thorium were discontinued. However, any radioactive wastes associated with these operations were disposed of during earlier phases of site remediation at off-site radioactive waste disposal facilities.

Finally, the NY State Department of Environmental Conservation (DEC) has indicated that "We would defer any letters to the State of Pennsylvania to the USEPA. While we have provided oversight to the project in the past, we are not the lead agency on the clean up efforts and since the materials are being sent to a PA landfill, it is up to the PA DEP to make any determinations on acceptance."

I trust that this letter provides you with the kind of information that you were requesting.

Sincerely,



Edward Als, Remedial Project Manager
Li Tungsten Superfund Site
NY Remediation Branch
Emergency and Remedial Response Division

cc: J. Calarie, URS